1) We continue to have concerns regarding reliable containment of the Ottoson Solvents Drum Area and believe this area should be evaluated further during the OU-1 FS. The results of that evaluation should allow us to determine if the area constitutes a hot spot (as we maintain), in which case we would recommend it be evaluated for treatment and/or removal.

This response seems to indicate that the Ohio EPA believes the Ottoson Solvents Drum Area still has waste that cannot be reliably contained, and in this setting, therefore will present a significant risk to human health or the environment if not treated. It is not clear to us why that is the state's position. We spoke with the OEPA OSC who performed the drum excavation (Dale Farmer) in this area and he claimed all drums in the photos were removed, characterized, and disposed off-site; and were not left in the excavation and reburied. There is not evidence that suggests any liquids sited during the excavation were anything other than precipitation infiltration. The groundwater contamination in this area is 70 pbb of TCE, which does not indicate a significant release of source contamination to the groundwater. We do not have information to suggest that a proper cover and proper leachate and groundwater management would not be successful in managing the waste in this area in place. Please clarify what source control work in the Ottoson Solvents Drum Area would be evaluated in the FS and how a cost estimate (+50 to -30%) for this remedial measure would be developed.

2) For the OU-1 cap, we would support selection of a Matcon cap with a minimum 1.5% slope for business areas and a hazardous waste cap with a minimum 3% slope for vacant areas.

We agree that this type of cap should be evaluated in the FS and would be a possibility for selection.

3) For the OU-1 landfill gas system (LFG), we would support selection of a fully penetrating active LFG and soil vapor extraction system with treatment of the extracted gas, as may be practicable, and/or as required by ARARs.

We agree these remedial measures should be evaluated in the FS and would be a possibility for selection.

4) Regarding the presumptive remedy components of source area groundwater/leachate control:

We have concluded that the best approach would be to incorporate these controls into the OU-1 RI/FS Report and OU-1 Proposed Plan and ROD.

We are willing to include in the scope of the current OU1 remedial action selection source area groundwater and leachate control. It does not seem reasonable to do this work as remedial design. This will require additional groundwater investigative work before the OU1 remedial can be selected, and will obviously delay the implementation of a cover for this area - assuming a cover is eventually selected as the remedial action. I assume this approach is not inconsistent with the investigative work the PRPs agreed to under the RI/FS AOC; and that we can get the PRPs to do this groundwater RI/FS work as part of OU1.

My understanding is that there are current unacceptable human exposures to indoor vapors in buildings that are on the site. We should address these exposures with appropriate measures asap, and should not wait for the resolution of the OU1 remedy selection. We should immediately evaluate doing this work as a Removal action.

However, if this is not possible, collection of the related data during the OU-1 RD (or sooner) could work assuming the following:

a. one of the objectives of the OU-1 RD data collection effort is to collect all data deemed necessary to evaluate and select source area groundwater/leachate controls;

This is RI work needed to determine the appropriate remedial action for groundwater and leachate associated with the OU1 landfill area.

b. the groundwater investigation focuses on distinguishing site-related contamination from non-site related contamination, rather than distinguishing contamination by depth; and

Agreed. The RI should identify site-related contamination as distinct from non-site related contamination.

c. the evaluation, selection, and implementation of these controls follows the streamlined presumptive remedy process, progressing on a schedule independent of the schedule for OU-2's "conventional" RI/FS.

The OU1 remedial measures can be selected and implemented before the OU2 work is selected and implemented.

5) For the source area groundwater/leachate controls, we would need to be able to review the proposed approach before we could provide comments or concerns. It is likely we would want to revisit potential hot spot sources of groundwater contamination if we conclude such controls may not be effective.

This is reasonable. EPA would also want to only select a groundwater control remedy that would be effective. Defining up front what constitutes a hot spot that cannot be contained and requires control beyond containment will be key to our agencies maneuvering cooperatively through this decision-making.

6) Our comfort with the above depends on the ability of the agencies to resolve any issues related to the OU-1 RI/FS Report and with components of the OU-1 remedy. Since we have not seen the report or the proposed plan, we cannot assure you that there will not be any other OU-1 issues.

Makes sense.

7) For OU-2, we would need to see the OU-2 RI/FS work plan and OU-2 RI/FS Report before we could provide comments or concerns.

Makes sense.